

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KIRSTEN CURLEY, individually and on
behalf of similarly situated individuals,

Plaintiff,

v.

VEROGEN, INC.,

Defendant.

Case No. 24-cv-9508

Hon. Edmond E. Chang

JOINT STATUS REPORT

Plaintiff Kirsten Curley and Defendant Verogen, Inc. (collectively, the “Parties”), by their respective counsel, hereby submit this Joint Status Report, in accordance with the Court’s Minute Entry dated December 9, 2024, and state as follows:

1. On November 4, 2024, the Parties filed an Agreed Motion to Stay Defendant’s Responsive Pleading Deadline for Settlement Purposes (the “Motion.” Dkt. 12), wherein the Parties informed the Court that they have engaged early settlement discussions and wanted to stay the case while they scheduled a mediation.

2. The Court granted the Motion on November 6, 2024 (Dkt. 14), and ordered the Parties to definitively state whether they will engage in a mediation and pick the mediator by December 5, 2024.

3. The Parties submitted a joint status report on December 4, 2024, informing the Court that they have chosen Mediator Hon. Diane M. Welsh (Ret.) of JAMS to conduct a mediation on March 11, 2025 in Philadelphia. (Dkt. 19.)

4. The Court continued the stay of the case and ordered another status report to be filed on March 17, 2025. (Dkt. 20.)

5. Since the last status report (Dkt. 19), the Parties have continued to proceed with settlement discussions, including exchanges of pre-mediation information and documents. During those discussions, however, the Parties reached an impasse and originally elected to cancel the March 11, 2025, mediation date. Since then, the Parties worked diligently to reach common ground on the issue that caused the impasse and have agreed to reschedule the mediation with Judge Welsh. The next available date for Judge Welsh that worked for all Parties is June 12, 2025, and the Parties are proceeding with that date for mediation.

6. Based on the information above, the Parties propose that the Court continue staying this case until the conclusion of the June 12, 2025, mediation, and provide a status report to the Court within a week after its conclusion.

DATED: March 11, 2025

Respectfully Submitted,

/s/ David L. Gerbie (w/ permission)

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